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By email to: industrycodes@ofgem.gov.uk

20 January 2012

Dear Lisa,

Re. Code Administration Code of Practice – User Feedback Form

Many thanks for the opportunity to respond to Ofgem's review of the Code Administration Code of Practice. The DCUSA is a multi party Agreement between electricity Distributors and Suppliers. It is concerned with use of the electricity distribution systems to transport electricity to or from connections to them. The DCUSA Panel is responsible for the effective and efficient administration of the Agreement on behalf of DCUSA Parties. Code Administration services are delivered by the Panel through a commercial contract with ElectraLink Ltd. The DCUSA Code Administrator is not currently required to comply with the Code Administration Code of Practice (CoP). However, the DCUSA Panel has adopted elements of the CoP as best practice where they reflect DCUSA operating processes.

We consider that the 12 principles set out in the CoP are appropriate for the delivery of robust code administration processes and reflect the needs of industry parties.

With regard to Principle 1, which describes the role of code administrators as 'critical friends', we consider that all Parties to the Agreement should be treated consistently and do not differentiate between categories of users. The Code Administrator delivers all the elements identified within Principle 1 to all Parties.

Principle 12 requires code administrators to report annually on KPIs. DCUSA Ltd places robust service delivery and performance targets on ElectraLink through its commercial contract and ElectraLink reports its performance to the Panel on a monthly basis. It is the view of the Panel that setting targets and reporting against them is important to ensure the code administrators are delivering their contractual obligations and operating at a satisfactory standard to support industry participants.

The DCUSA Panel considers that its current application of the CoP principles where they reflect DCUSA operating procedures is appropriate. We agree that this common approach aids party understanding of the market governance arrangements, and can also assist in communication / understanding between code administrators.

Please let me know if you require any further information.

Yours sincerely,

Chris Allanson

DCUSA Panel Chair